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ABSTRACT

This booklet presents a collection of essays on issues in accreditation of teacher education. Each author presents the perspective of his or her particular interest group. Kenneth E. Young, of The Council on Postsecondary Accreditation, provides a historical review of past issues and current developments. Frederick R. Cyphert and Nancy Lusk Zimpher, of The Ohio State University, present the higher education perspective and touch on the following topics: Who should be involved in the accreditation process?, Should accreditation be prescriptive or descriptive?, and Should accreditation be mandatory or voluntary? John R. Profitt, of the U.S. Office of Education, offers the federal perspective and discusses the relationship between the federal government and private accrediting agencies and related issues. Margaret Knispel, of the National Education Association, deals with the rationale for including teachers in accreditation of teacher education. She discusses the desirability of voluntary versus mandatory systems, improvement of current processes and standards, financing, role of the public, and emerging trends. Sidney Simandle, director of teacher education and certification within the Kentucky State Department of Education, poses relevant questions concerning the roles of state legal agencies, teacher education institutions, local school districts, professional organizations, and the National Council for Accreditation of Teacher Education. (JA)

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ACCREDITATION ISSUES IN TEACHER EDUCATION

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John R. Proffitt
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CONTENTS

Foreword . . . . . *iv*

Current Issues in Accreditation
Kenneth E. Young 1

The Governance of Teacher Education Accreditation: A Higher Education Perspective
Frederick R. Cyphert and Nancy Lusk Zimpher 5

Accreditation from the Federal Perspective
John R. Proffitt 9

Issues in Accreditation
Margaret Knispel 15

Governance of Accreditation in Teacher Education
Sidney Simandle 21

FOREWORD

Special Current Issues Publications (SCIPs) are intended to assist in the clarification of important issues. This SCIP is concerned with accreditation in teacher education.

Most sources of control in teacher education operate at state and local levels. Accreditation is one of the few identifiable phenomena in teacher education that is *national* -- it is a suprastate, nonfederal, pervasive force -- where interested groups find an arena with potential for both conflict and cooperation. Accreditation in teacher education appears as a dynamic force-field that affects all persons involved in preparing and upgrading education personnel. The effects on different groups vary depending on their polarities and priorities.

The ERIC Clearinghouse on Teacher Education offers this SCIP as a brief discussion of basic issues from various viewpoints. To do so is both useful and timely owing to (a) increasing activity on the federal level, (b) significant changes in the structure of the national accrediting agency, the National Council for Accreditation of Teacher Education (NCATE), (c) emergence of a new accreditation superbody, The Council on Postsecondary Accreditation (COPA), and (d) continuing concern regarding definition of the role of accreditation with respect to other controls and constraints on teacher education.

The six writers presented in this SCIP graciously contributed their mental energies and analytic skills to help focus the continuing discussion. Independently, and from their individual perspectives, each author has attempted to define and briefly discuss those few most important current issues surrounding accreditation in teacher education. Reflecting the current status of accreditation in teacher education, most of these issues have to do directly with control and power; they have little to do directly with what is best for children in schools. When resolved, issues regarding distribution of power will give way to a primary focus on the cooperative development of accreditation processes that will improve the quality of education for children and youth.

The Clearinghouse is indebted to the following authors who provided the material for this first publication in the series: *Frederick R. Cyphert*, dean, College of Education, The Ohio State University, Columbus, and *Nancy Lusk Zimpher*, administrative assistant, College of Education, The Ohio State University, Columbus; *Margaret Knispel*, professional associate, National Education Association, Washington, D.C.; *John R. Proffitt*, director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, U.S. Office of Education, Washington, D.C.; *Sidney Simandle*, director, Division of Teacher Education and Certification, Kentucky State Department of Education, Frankfort; and *Kenneth E. Young*, president, The Council on Postsecondary Accreditation, Washington, D.C.

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Joost Yff, Director

CURRENT ISSUES IN ACCREDITATION

Kenneth E. Young
The Council on Postsecondary Accreditation

HISTORICAL REVIEW

Fifteen years ago, the executive director of the National Commission on Accrediting listed some important issues regarding accreditation, as follows:

* Developing accreditation criteria which emphasize continuing institutional reevaluation, experimentation, and improvement

* Using accreditation to stimulate quality institutions

* Managing the increase in graduate school accreditation without inhibiting independent research and individual scholarship

* Assuring quality in specialized institutions and additional professional programs without increasing the number of professional accrediting agencies

* Simplifying accreditation without lessening its effectiveness

* Satisfying information needs about institutional quality through accreditation

* Satisfying government's interest in higher education without increasing its involvement.[1]

This list remains uncannily pertinent. The first statement, for example, speaks to current efforts in the area of competency-based teacher education.

More recently, a 1969 conference on accreditation discussed the following major issues:

* The proliferation of professional accreditation activities and implications for higher education institutions

* The question of whether accreditation stimulates innovative ideas and practices or impedes them

* Increased Congressional use of accreditation to establish institutional eligibility for federal funds

* Issues and implications of the court's decision in *Marjorie Webster Junior College v. Middle States Association of Colleges and Secondary Schools*, which dealt with accreditation of proprietary schools

* Pressures for the state-agency approach to accreditation

* Need for an adequate accrediting program in vocational-technical education

* Likelihood that accreditation would become an issue in campus turmoil

* Growing demand for educational accountability

* The question of fees charged by accrediting organizations for services rendered to institutions

* The possibility of clustering some specialized and professional accrediting activities, such as those in the health-related fields, so that institutions would not be compelled to duplicate their costs and efforts for scores of separate accreditation visits and organizations.[2]

Six years later, these issues are still with us. The Marjorie Webster College case was decided in favor of the Middle States Association, but subsequent developments have made the decision moot. Proprietary schools are gradually being accredited by regional accrediting associations, and specialized institutional accrediting agencies that deal with proprietary schools (the Association of Independent Colleges and Schools, the National Association of Trade and Technical Schools, and the National Home Study Council) are now members in good standing of the accrediting community. While student activists did not seize upon accreditation as an issue, the student role in the accreditation process remains unclarified. As Dickey and Miller observed in 1972, *"Accreditation, while consolidating its importance and stature, has not found tranquility....Not only are the residues of past problems and controversies likely to linger, but the significance and new visibility of accreditation as important forces in society are combining to create new problems and issues."*[3]

RECENT DEVELOPMENTS

There have been at least five developments over the past 10 years which have had a major impact upon higher education, particularly accreditation. First, many colleges and universities reacted to the student unrest of the late 1960s by introducing new curricular and learning options; they became less traditional. The public, particularly state and federal government, began to reexamine its uncritical acceptance of the worth of traditional higher education.

Second, Congress enacted the Education Amendments of 1972, legislation which should come to rank historically with the Land-Grant College Act and the GI Bill of Rights. This act identified "higher education" as part of a larger universe, "postsecondary education." The Amendments took the position that the educational activities of vocational-technical institutions and proprietary schools were legitimate and important and as worthy of support as those of colleges and universities. They asserted that *all* forms of education beyond high school -- wherever offered, however organized -- were potentially valuable and worthy of federal support.

Third, recent enrollment declines prompted a number of colleges and universities to accept new kinds of students -- part-time, mobile, older, educationally disadvantaged. In most instances the needs and expectations of these students have differed from those of more traditional students.

Fourth, consumerism has brought about increased concern for protecting students from a variety of abuses, ranging from arbitrary refund policies to misrepresentation of job opportunities. Affirmative action legislation and the so-called Buckley Amendment have given additional force to this issue. More recently, attention has focused on improving both the quantity and quality of information provided potential students.

Finally, the economic crunch of the last year or so finds the federal government, state governments, foundations, philanthropists, and prospective students asking: Do we put our limited dollars into education or something else? If education, what kind? And what will we get for our investment?

For the accreditation community, these developments pose three new kinds of problems or, if you will, opportunities:

* Established institutions are changing many of their ways of doing thin s and are reaching out to new student clienteles

* Institutions and programs new to the accreditation process are seeking appropriate recognition

* Accreditation faces a compelling need -- a demand, really -- for more effective, economical ways of evaluating and monitoring these many diverse educational activities.

This is a time for the accreditation community to provide leadership in (a) recognizing the value of *socially useful abilities* in addition to academic talent; (b) understanding the meaning of various *learning styles;* (c) acknowledging the effectiveness of different *educational settings;* and (d) pursuing the implications of research findings on *educational outcomes.*

Teacher Education

In a 1974 paper, Rolf W. Larson, director of the National Council for Accreditation of Teacher Education (NCATE), identified four basic accreditation problems in the area of teacher education:

* Allowing for institutional differences in a common accreditation evaluation

* Basing accreditation decisions on real college substance rather than on elements of form

* Determining the actual focus or function of accreditation

* Determining the actual qualifications of the graduate.[4]

He went on to discuss the potential of performance-based, or competency-based, teacher education for responding to these problems, writing:

> *If the PBTE movement can result in a much more explicit and complete definition of the competencies needed for teachers (and other school workers) and if, after such a definition is made, it can result in*

significantly improved training modes, the implications for teacher education are great....the PBTE movement might provide the experience necessary to move accreditation from its present general unfocused practices to a point of higher efficiency and more focused and direct action.[5]

Accrediting agencies are following this development with great interest, just as they are awaiting the results of the Council on Postsecondary Accreditation study on the development of improved techniques for evaluation of educational outcomes in institutions of postsecondary education. There is much debate concerning the potential value and control of PBTE, just as there has been great disagreement over the accreditation of teacher education. The major questions remain:

- Should teacher education be accredited separately, since such programs are almost always located in accredited institutions?

- What should be the focus of accreditation -- theory vs. application, or process vs. product?

- How should the accrediting machinery be structured and controlled, inasmuch as there are a number of competing interest groups involved?

The last question, it would appear, once again threatens to overwhelm the others.

NOTES

1. William K. Selden, Accreditation: A Struggle over Standards in Higher Education. (New York: Harper & Row, 1960) pp. 94-95.

2. "The 1970's: Time for Assessment in Accreditation," in Annual Report of the Executive Director. (Washington, D.C.: National Commission on Accrediting, 1970) no page given.

3. Frank G. Dickey and Jerry W. Miller, A Current Perspective on Accreditation. (Washington, D.C.: American Association for Higher Education, 1972) no page given.

4. Rolf W. Larson, Accreditation Problems and the Promise of PBTE. (Washington, D.C.: American Association of Colleges for Teacher Education and ERIC Clearinghouse on Teacher Education, 1974) p. 2.

5. Ibid., p. 26.

THE GOVERNANCE OF TEACHER EDUCATION ACCREDITATION: A HIGHER EDUCATION PERSPECTIVE

Frederick R. Cyphert
Nancy Lusk Zimpher
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WHO SHOULD CONTROL ACCREDITATION?

Any discussion of accreditation centers around the pervasive question, *"Who should control the accreditation of teacher education?"*, and the answer determines how other related issues are resolved. In responding to this question, we shall proceed as follows: We will (a) state a position taken by one of the groups currently vying for control of teacher education; (b) depict briefly the rationale for the position held; and (c) present weaknesses, counterarguments, and/or fallacies of the position.

Viewpoint of Professional Teacher Educators

Position I: Professional teacher education personnel, in behalf of the total profession, should dominate and control the accreditation of teacher education.

Rationale: Higher education personnel offer the teacher training program, and know best what should be included in effective programs. In addition, they bear the bulk of the expenses of accreditation. While personnel in higher education agree that teacher education accreditation is not what it should be, they do not believe it will be improved by putting someone else in charge. In fact, they believe that diffuseness in the control of accreditation has weakened it as a quality control mechanism.

Fallacy: Divergent groups have been allowed to share control of the process instead of *participating* in the process. What is needed is broad involvement instead of broad control.

Viewpoint of Federal and State Government

Position II: Either or both federal and state government, in behalf of the total profession and the public, should dominate and control the accreditation of teacher education.

Rationale: Accreditation is not effective as currently constituted and executed. At the national level, the government is looking for ways to have greater control over education in general, increase its influence, and assure continued employment of personnel already in the education bureaucracy. At the state level, the issue of control is closely related to certification. State departments of education would prefer to limit expansion of professional organizations in areas where state governments have had a significant voice in the past. Control by professional organizations could lead to attempts to control certification. Such a move would threaten the job security, influence, and status of state education departments.

Fallacy: Certification has traditionally been the responsibility of state departments of education because of the state government's constitutional authority over public elementary and secondary education. Further, state certification,

through reciprocity, has become roughly equivalent to national certification because of similarity in state legislation. As a result, opponents of federal and state government control of accreditation have concluded that it would be unhealthy for government to control both of the two chief quality control mechanisms which relate to the preparation of education personnel--accreditation and certification. Consequently, accreditation should remain free of the mantle of both federal and state government control. Further, it would seem that the proper role of state government is to improve its present task, certification, rather than assume responsibility for the additional task of accreditation.

Viewpoint of Professional Organizations

Position III: Professional organizations, in behalf of the total profession, should dominate and control the accreditation of teacher education.

Rationale: Teachers claim that since they are in daily contact with children in classrooms, they know more than higher education teacher educators. In addition, teachers contend that the larger group (elementary/secondary teachers) should control the smaller (higher education teacher educators).

Fallacy: Teachers understand teaching, but not teacher education. They should have input into the identification of teacher classroom competencies, but they have little expertise in developing the outcomes. The size of professional constituent groups is irrelevant.

Viewpoint of the Authors

Position IV: Even though the authors of this article are members of the higher education constituent group, we feel support for any of the positions elaborated above should be arrived at based on the following set of assumptions regarding the control of accreditation.

Assumption 1: One is likely to find scholars among the ranks of teacher educators, who are adept at building teacher education programs and competent to analyze, assess, and evaluate the outcomes of teacher preparation curricula.

Assumption 2: There should be a direct relationship between responsibility for teacher education, authority to make decisions relative to accreditation, and competency as a teacher educator. Power should stem from knowledge.

Assumption 3: There should be clear differentiation between involvement (participation) and control (authority).

Assumption 4: There should be a direct relationship between paying for a service and controlling the service one receives for that payment. Since higher education pays more than 80 percent of the cost of accreditation, when one considers the internal institutional costs (i.e., costs of preparing for evaluation), then higher education must make final determinations regarding accreditation.

Assumption 5: Internal quality control is more effective than external control. Standards developed by people whose knowledge and ability are known by practicing teacher educators have more credibility than standards developed by any external group or agency.

RELATED ISSUES

There are a number of important subissues associated with the governance of accreditation. Those discussed below are issues whose outcomes we feel will be determined largely by the controlling force in accreditation. We feel, however, that there is no monolithic position regarding these and other issues among professional teacher educators because no one organization speaks for the group.

Who Should Be Involved in the Accreditation Process?

Higher education teacher educators should have overall input into the development of accreditation standards. We should be concerned with questions of substance, process, and organization needed to develop competencies for school personnel. Teacher educators should have majority involvement on accreditation teams and decision-making boards. Higher education control presumes that teacher educators will make evaluative decisions which will eliminate institutions that are not effectively training teachers, by utilizing a knowledge base rather than the political base often used by non-teacher educators and/or agents outside the profession. Certification and the job market provide other checks on assessment

Practicing teachers should have input into the development of accreditation standards exclusively in the area of identifying classroom competencies needed by preservice and inservice teachers. In addition, teachers should have minority membership on accrediting teams and boards, and react with visiting accreditation teams.

Students should have a significant role in accreditation and react with visiting teams, as well as have minority participation on accreditation teams and boards.

The government and other lay representatives should provide limited input into the standards relative to: (a) identifying the ends which society wants schools to pursue that have implications for what teachers need to know, value, and be able to do; and (b) establishing the funding necessary to support desirable practices. In addition, members of the local community should serve as respondents to visiting teams regarding the effectiveness of area colleges in providing competent teachers.

Should Accreditation Be Mandatory or Voluntary?

The traditional higher education position is that accreditation should be *voluntary* because (a) the primary goal has been to *improve* institutions, (b) no one has exercised the authority to mandate accreditation, and (c) many colleges have wanted to keep teacher education programs at a financially profitable level of quality.

The classroom teaching profession position is that accreditation should be *mandatory* since teachers would like to *screen out* unproductive programs. The growing power of organized teacher groups is thus transferred into increasing control over teacher education, simply because these groups can weed out all who oppose them.

It is difficult to pin down the federal government position, and the state government stance on this issue is less than clear. Many states have moved to require

accreditation through an "approved program" approach to certification. The motivation is to convince state legislatures that state departments of education can enforce quality control in teacher education, obviating the necessity for feared professional practice boards.

The authors' position is dependent on the question of who controls accreditation. If ultimate decisions are to be made by higher education teacher educators, based upon knowledge about teacher education, then we believe the time has come to make accreditation mandatory. This could serve to eliminate as much as 25 percent of existing teacher preparation programs. We do not see this reduction as inhibiting the improvement of accredited institutions, if controlled experimentation is encouraged. However, if control is to rest in the hands of professional organizations or government officials who use a political base for arriving at decisions, then accreditation should remain voluntary, if it should continue at all.

Should Accreditation Be Prescriptive or Descriptive?

Practicing teachers want to make accreditation prescriptive, i.e., with specified standards that require strict programmatic adherence prior to accreditation. Teachers could then specify that teacher education curricula have an apprenticeship base rather than a theoretical one. Teacher control through prescriptive standards could eliminate institutions unable or unwilling to train teachers according to teachers' prescribed models. Teachers could also control access to the professoriate by prescribing requisite experiences for becoming a teacher educator, such as five years of prior classroom experience.

Teacher educators, in contrast, have usually supported a *descriptive* approach to accreditation, believing there is no one proven way of training teachers. Teacher educators feel that teacher-training institutions should be evaluated in terms of college program objectives. Not only do descriptive standards allow more latitude for experimentation, but they also force institutions to provide evaluation measures, thus supporting the type of training offered by the institution.

Both federal and state government, and the lay community they are responsive to, have no real position in the prescriptive/descriptive debate. The government posture is better described as any stance that will foster government control of certification. One can only assume that if their control over certification were eventually extended to accreditation, that it too could be prescriptive, since the process of certification has historically been prescriptive.

CONCLUSION

Three thoughts seem appropriate here. First, higher education teacher educators are not able to arrive at a consensus regarding the governance of accreditation. No organization can speak for all of us, and we are not willing to resolve our minor differences for the common good. It is difficult to arrive at any agreement when our actions show that our diversities overshadow our mutual concerns. Second, the inherent danger in our assuming dominant control of the accreditation of teacher education rests in professional incapsulation which results in sterility of ideas, parochial thinking, and inability to perform self-surgery. Third, all parties concerned with the governance of accreditation seem unable to agree on criteria for making relevant decisions; consequently, a mutually acceptable resolution seems unlikely.

ACCREDITATION FROM THE FEDERAL PERSPECTIVE

John R. Proffitt
U.S. Office of Education

ORIGIN AND PURPOSES

Control of education in the United States has traditionally been by states and local communities. Unlike many other nations, the United States has no central authority which controls education institutions. Each state has developed its own public school and higher education systems, and most have provided for chartering and otherwise regulating private institutions. Due to the absence of centralized government control over American education, institutional programs vary widely in character and quality. Accreditation processes have developed in response to the public need for (a) insuring a basic level of program quality, and (b) preventing chaos which might result from decentralized control over a multiplicity of education institutions.

Accreditation is a peer evaluation process conducted by private education associations of regional and national scope. Evaluation procedures are defined by these voluntary, nongovernmental accrediting agencies, which fall into two major categories: institutional and specialized. Institutional accreditation is regional, and signifies that the institution as a whole is achieving its objectives satisfactorily. Specialized accreditation refers to programs rather than institutions, and is conferred by national organizations representing professional or occupational interests.

The Private Perspective

Private accrediting agencies and the federal government view accreditation differently. The private sector sees institutional accreditation at the postsecondary level as a means of:

* *fostering excellence in postsecondary education through the development of criteria and guidelines for assessing educational effectiveness*

* *encouraging institutional improvement of educational endeavors through continuous self-study and evaluation*

* *assuring the educational community, the general public, and other agencies or organizations that an institution has clearly defined appropriate educational objectives; has established conditions under which their achievement can reasonably be expected; appears in fact to be accomplishing them substantially; and is so organized, staffed, and supported that it can be expected to continue to do so*

* *providing counsel and assistance to established and developing institutions*

* *protecting institutions against encroachments which might jeopardize the educational effectiveness or academic freedom*[1]

The Federal Perspective

The U.S. Office of Education (USOE), on the other hand, views accredita- as a means of:

* *Certifying that an institution has met established standards*

* *Assisting prospective students in identifying acceptable institutions*

* *Assisting institutions in determining the acceptability of transfer credits*

* *Helping to identify institutions and programs for the investment of public and private funds*

* *Protecting an institution against harmful internal and external pressures*

* *Creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions*

* *Involving the faculty and staff comprehensively in institutional evaluation and planning*

* *Establishing criteria for professional certification, licensure, and for upgrading courses offering such preparation*

* *Providing one basis for determining eligibility for Federal assistance*[2]

We must emphasize that accrediting agencies are private, independent, voluntary associations whose purposes do not necessarily coincide with federal objectives. Accrediting agencies are committed to programmatic uplift through peer review. They do not function as regulatory bodies. However, as the judgment of accrediting agencies has become a basis for determining federal funding eligibility, their public responsibility has increased. Changes in policies and procedures of accrediting bodies indicate that they have become more public-oriented.

RELATIONSHIP BETWEEN THE FEDERAL GOVERNMENT AND PRIVATE ACCREDITING AGENCIES

USOE has identified approximately 20 federal agencies concerned with the accreditation status of postsecondary institutions. Many rely upon the list of nationally recognized accrediting agencies published by the U.S. commissioner of education. Among federal agencies, probably USOE has the most direct relationship with private accrediting associations, although it has never been authorized to assume an accrediting function. In fact, USOE does not seek such authority. As recently as 1968, the commissioner stated that:

> *...the development and maintenance of educational standards is the responsibility of non-governmental, voluntary accrediting associations.... It is the policy of the Office of Education generally to support and encourage the various recognized voluntary accrediting associations in their respective activities, and to endorse their role as the primary agents in the development and maintenance of educational standards in the United States.*[3]

With the enactment of the Veterans' Readjustment Assistance Act of 1952 (P.L. 82-550), also known as the G.I. Bill, the commissioner was assigned a specific responsibility related to accrediting. He was required to publish a list of nationally recognized accrediting agencies and associations considered reliable authorities regarding the quality of training offered by education institutions and programs, in order to determine eligibility of institutions to benefit from the new law. This statutory provision was subsequently restated in at least 15 major federal aid-to-education legislative acts. In October 1952, criteria for recognition of national accrediting agencies and an initial list of 28 agencies so recognized were published in the *Federal Register*. The criteria have since been revised twice, in 1969 and 1974, when the current criteria were published.. The number of agencies recognized has increased from 28 in 1952 to 63 as of June 1975.

An analysis of the major features of the present criteria reveals some expectations concerning the performance of accrediting agencies. These elements include:

* *Functionality* - An accreditating agency should be regional or national in scope and maintain a clear definition of its activities regarding (a) geographic area, and (b) nature and type of institutions or programs covered. It should have adequate administrative and financial support and access to competent personnel to participate on visiting teams and decision-making committees, and as consultants. The agency should have specific procedures regarding level of accreditation status, including institutional or program self-analysis and on-site reviews by visiting teams.

* *Responsibility* - Considerations in assessing agency responsibility include: (a) clearly identified need for accreditation by the agency in the field in which it operates, (b) responsiveness to public interest, (c) adequate provisions for due process in accrediting procedures, (d) demonstrated capability and willingness to foster ethical practices among institutions or programs accredited, and (e) a program for evaluating educational standards.

* *Reliability* - The agency should demonstrate wide acceptance of its policies, procedures, and decisions; regular review of its standards and procedures; experience as an accrediting agency; and representation in its decision-making bodies of the community of interests directly affected.

* *Autonomy* - The agency must demonstrate the autonomy and independence of its decisions from outside influences.

It is noteworthy that these recognition criteria place increased emphasis upon accrediting agencies' reliability and responsibility to the public interest.

Accrediting agencies requesting recognition by the commissioner of education undergo intensive review by USOE's accreditation and institutional eligibility staff in the Bureau of Postsecondary Education, and the commissioner's Advisory Committee on Accreditation and Institutional Eligibility, in order to determine whether or not the agencies comply with the criteria. Although the ultimate decision regarding recognition of an agency rests with the commissioner, the Advisory Committee performs a key role in the recognition process. Composed

of 15 members from various segments of the secondary and postsecondary education community, student/youth population, state departments of education, professional associations, and the general public, the committee advises USOE on matters relating to accreditation and institutional eligibility for federal education programs.

ISSUES

Reliance upon Accreditation as a Factor in Institutional Eligibility for Funding Determinations

One issue growing out of federal eligibility for funding procedures is government reliance on private, independent agencies for qualitative assessments. Unfortunately, accreditation is not necessarily a reliable indicator of institutional integrity and, therefore, there should be less reliance upon accreditation as a funding determinant. An opposing view is that criteria being used in accreditation are as satisfactory sources of reliable information as can be found.

Some form of accreditation is included in almost all institutional eligibility requirements for federal education programs. The basic framework for federal reliance was developed for the 1952 Korean G.I. Bill, and reinforced by the 1958 National Defense Education Act (NDEA).

Accreditation is too often equated with eligibility, thus overlooking the fact that accreditation itself is only one of a *series* of criteria which must be met to establish eligibility for USOE-administered programs, albeit the most important.

Accreditation and Protection of the Educational Consumer

Consumerism has made the federal government increasingly aware of abuses resulting from unethical operations of some education institutions, and for the need for increased protection of the public. USOE has made public the present criteria for recognition of nationally recognized accrediting agencies in order to show that accrediting agencies recognized by the commissioner share responsibility for the public interest and protection of the educational consumer.

There are several consumer protection features of the criteria which illustrate the requirements placed upon accrediting agencies:

* Consideration of the rights, responsibilities, and interests of (a) students, (b) the general public, (c) the academic, professional, or occupational fields involved, and (d) institutions

* Inclusion of public representatives in decision-making bodies, or in an advisory or consultative capacity that assures attention by the decision-making bodies

* Availability of public information regarding accreditation standards, procedures, status, and date of next review; names and affiliations of decision-making bodies; names of principal administrative personnel; and description of ownership, control, and type of legal organization of the agency or association

* Written procedures for review of complaints pertaining to institutional or program quality which provide for timely treatment in a manner that is fair to both complainant and institution or program

* Capability and willingness to foster ethical practices, including non-discriminatory practices in admissions and employment, and equitable tuition refunds

* Securing of information which demonstrates that the institution or program conducts an ongoing program of evaluation of outputs.

The federal government's expectations for accrediting agencies in the area of consumer protection are stated not only in the criteria but also in a report discussing federal strategies for protecting consumers, issued by the Subcommittee on Educational Consumer Protection of the Federal Interagency Committee on Education. The Subcommittee, created in 1972 to study major problems and issues confronting students as consumers of educational services, stated among its principles and recommendations:

> *State educational agencies and private associations or agencies which have direct responsibility for accrediting, approving, licensing, and certifying educational institutions and students, should do so with issues of consumer protection clearly in mind. The overall effort to protect the educational consumer must involve consumer agencies and organizations, both public and private, in a vital way.*[4]

Relationship Between the Federal Government, Accrediting Agencies, and the States

Current federal statutes and regulations governing participation of postsecondary educational institutions in federal aid to education programs require, among other elements, that such schools be *"legally authorized within such State to provide a program of education beyond secondary education."*[5]

The statutory system for establishing postsecondary institutional eligibility for participation in USOE-administered education programs consists of three complementary elements: (a) state chartering, licensure or approval, (b) accreditation by a nationally recognized accrediting agency, and (c) federal program requirements. As noted above, the accreditation component of this tripartite relationship has been heretofore the most important element in the eligibility determination system. Increasingly, however, USOE is focusing its attention on the state role in approval and eligibility processes. The relationship between the federal government and the states also has implications for the future of private accrediting agencies. Under the so-called Mondale Amendment of the Education Amendments of 1972, the commissioner of education is required to *"publish a list of State agencies which it determines to be reliable authority as to the quality of public postsecondary vocational education in their respective states for the purpose of determining eligibility for all Federal student assistance programs."*[6] As a result of this amendment, public postsecondary vocational education institutions or programs can satisfy the qualitative element of eligibility requirements either by obtaining accreditation by a nationally recognized accrediting agency, or approval by a recognized state agency.

It is still too early to assess whether public vocational institutions are electing in large numbers to seek approval by a state agency in lieu of accreditation by a nationally recognized agency. As long as national accrediting agencies continue to perform assessment of quality within the framework of their standards, it appears likely that the nongovernmental accrediting mechanisms will continue to be used as the primary agent for determination of institutional or programmatic quality.

NOTES

1. Sherry S. Harris, ed. Accredited Institutions of Higher Education 1974-75, (Washington, D.C.: 1974) American Council on Education, p. 3.

2. Nationally Recognized Accrediting Agencies and Associations. Criteria and Procedures for Listing by the U.S. Commissioner of Education and Current List, January 1975. (Washington, D.C.: U.S., Dept. of Health, Education, and Welfare, 1975) p. 1.

3. Harold Howe,"U.S. Office of Education Policy Statement: The Role of Voluntary Accreditation in the United States, November 1968,"in Accreditation and Institutional Eligibility Staff. List of Nationally Recognized Accrediting Agencies and Associations. (Washington, D.C.: U.S., Department of Health, Education, and Welfare, 1969) p. 2.

4. Toward a Federal Strategy for Protection of the Consumer of Education: A Report from the Subcommittee on Educational Consumer Protection to the Federal Interagency Committee on Education. (Washington, D.C.: U.S., Dept. of Health, Education, and Welfare, 1974) p. viii.

5. Higher Education Act of 1965, as amended, Pub. L. 89-329, Sec. 1201 (November 8, 1965).

6. Education Amendments of 1972, Pub. L. 92-318, Sec. 132E (June 23, 1972).

ISSUES IN ACCREDITATION

Margaret Knispel
National Education Association

Teachers today tend to have a significant role in planning and designing their own education. That role includes a voice in accreditation of teacher preparation institutions.

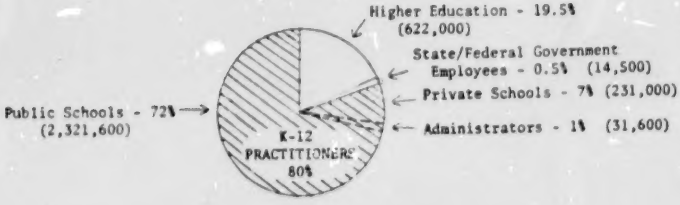
RATIONALE FOR INCLUDING TEACHERS

The 1.7 million-plus members of the National Education Association (NEA) regard major involvement in national accreditation decision-making (and state approval) as a potential means of helping ensure quality teacher education. Their 1974 resolution (No. 74-21) on teacher education reads:

> *...teachers and students preparing to teach must be directly involved in evaluating and improving the standards for teacher preparation and certification. The Association insists that teacher input is necessary in planning and implementing quality teacher education programs....*[1]

The rationale for this resolution is that practicing teachers are the prime *consumers* of teacher education, and know best what they need in order to improve their services to students.[2] In addition, K-12 practitioners make up by far the largest group within the profession. The following illustration shows percentages and actual numbers of persons involved in teaching.

The Teaching Profession
(USOE 1974 Estimates)



PURPOSE: INSTITUTIONAL IMPROVEMENT OR QUALITY CONTROL?

Of the approximately 1,400 state-authorized colleges or universities in the United States currently engaged in preparing teachers, only 540 are accredited by the National Council for Accreditation of Teacher Education (NCATE).[3]

Teachers are concerned with both state and national accreditation. Many state standards and/or approval processes are permissive, and almost any institution

can meet them. These standards and processes are determined by state boards of education (made up primarily of laypersons), or by staff members of state departments of education. Teachers want the *profession*, not state officials, to set standards and determine processes for state approval. State-delegated control is just beginning to come to teaching. It became a reality in California in 1970 and Oregon in 1973. In both states, a commission including a majority of educators has responsibility for certification and state approval. Three other states--Minnesota, Pennsylvania, and Massachusetts--have advisory commissions which meet NEA's criteria for standards and licensure groups.[4] Still others are in the process of developing such legislation.

Can a private and voluntary accrediting body serve as an indicator of quality? A report just released by the National Advisory Council on Education Professions Development (EPD) asserts:

> *Accreditation, even when performed by an association recognized by the U.S. Commissioner, is not necessarily an indicator of quality...The confusion derives from the historic beginnings of accreditation, when the associations in fact sought to inspect for quality. Over the years that concept has changed, however, and the accrediting bodies now seek to determine whether each school is making satisfactory progress toward its goals.*[5]

It seems that NCATE may be able to improve the situation. NCATE standards have recently begun moving beyond an emphasis on meeting an institution's goals to evaluation of the product (i.e., teacher). Because of that new emphasis, teacher-practitioners believe that if present NCATE standards are applied, accreditation by NCATE could be a real indication of quality. Evidence is already beginning to mount. Six or seven years ago, most institutions that applied for accreditation were given full or partial accreditation. Partially accredited institutions had at least three years to do what was necessary in order to become fully accredited. In the meantime they were included in the annual list of accredited institutions circulated by NCATE. These procedures have changed. In 1974, 25 of 49 accreditation-seeking institutions were given full accreditation, while the others had all or some of their programs denied because they did not meet the criteria. Some changes are taking place in the direction of quality control!

DESIRABILITY OF VOLUNTARY VS. MANDATORY SYSTEMS

In the latest yearbook of the National Society for the Study of Education (NSSE), Bush and Enemark point out:

> *For a successful college or university, submitting to or seeking out accreditation is about as voluntary as summoning a physician if you are struck with a heart attack or stopping at a red light on a highway. The federal government uses established accreditation as a screening device for granting funds. Foundations, athletic associations, and reciprocal interstate arrangements all use "voluntary" accreditation listings for determining worthiness of institutions or programs.*[6]

Why, then, should teachers not use accreditation as a means of deciding where to spend their money in order to get the kind of professional education they need? Two ways of motivating institutions to seek accreditation are to (a) let educational consumers know which institutions are accredited, and (b) give priority to graduates of those institutions when hiring.

Until now, only a few NCATE lists have found their way to guidance counselors and high schools, but no concerted effort has been made by NCATE to carry the information to consumers. The whole national accreditation process will be strengthened when lists are distributed to every school career-information center and every teacher who continues education beyond the initial preparation.

As accreditation becomes an indicator of quality, teachers' associations will want to negotiate the hiring of graduates from NCATE-accredited institutions because it is in their interest that new members of the profession have the best possible preparation.

CURRENT PROCESSES AND STANDARDS: HOW CAN THEY BE IMPROVED?

Practitioners are enthusiastic about the move to program rather than institutional accreditation. Practicing teachers have been bothered by the fact than an institution could be accredited even though some of its programs were weak. In the past, program approval was too complicated, expensive, and time-consuming, but technological/computer advances may make program approval feasible. A special NCATE committee, representing all the present constituents and aided by outside consultants, is studying the problem and should have recommendations within the year.

The present NCATE procedure of accreditation visits once every 10 years is ineffective and must be changed. With rapidly increasing knowledge about learning and teaching, ups and downs in institutional financing, and frequent changes in administration of colleges and universities, there is no assurance that a program which is considered of high quality now will remain so for 10 years. Most states give approval for not more than five years, and the United States Office of Education (USOE) reevaluates its recognized accrediting agencies at least once every four years.

Reduction of the present number of NCATE standards by factor analysis could simplify institutional reports and save time. The newly-formed NCATE Standards Committee, now under the aegis of the Council, should be funded adequately to pursue its work in this regard.

FINANCING: WHO SHOULD PAY?

Practitioners feel that accreditation is an expense chargeable to the teacher preparation program and should, therefore, be borne by the particular institution engaged in that preparation. The income from institutional subsidies and enrollment fees seems a suitable means of covering accreditation costs. Of course there are strains on every budget, but priorities must be established--and the cost of accreditation, if it is to be an indicator of quality and a basis for reciprocity, should certainly be a priority.

The monies which teacher preparation institutions allocate for accreditation do not constitute organizational contributions to NCATE. The self-study necessitated by the accreditation process should be done by an institution as part of its constant renewal, and the monies involved should not be chargeable totally to the cost of national accreditation.

The money NEA contributes to NCATE comes from individual members' pockets--not from institutional or tax funds, or enrollment fees. NEA members are willing to spend some money to improve their profession, and have contributed substantially (with the exception of one year) to NCATE since it was established in 1954.

The chart included below shows the NCATE budget as well as organizational and other contributions to it over the years. Teacher education institution leaders would call this budget the "tip of the iceberg," since it does not reflect institutional costs, other than the actual visitation fee. Some teacher educators argue that the one who pays should control the system. But if that logic were to be followed, then students would have much more control of colleges and universitites than they have now!

ROLE OF THE PUBLIC: WHAT IS IT?

Although accreditation belongs in the area of professional control, in the interest of protecting citizens, all possible means of including and informing the public should be employed. The whole question of how persons who actually represent the public can be located to serve as "watchdogs" on professional boards is problematic. Do professional boards really represent the public at large? At present, only one member of the 19-person NCATE represents school boards. Two are state department of education staff, representing the Chief State School Officers (CSSO) and the National Association of State Directors of Teacher Education and Certification (NASDTEC).

EMERGING TRENDS

Teacher preparation should be based in higher education and field oriented. Accordingly, governance of the profession must ensure practitioner involvement. Until recently, such involvement has been only token in practice. As far as accreditation is concerned, NCATE has "belonged" to higher education despite the fact that NEA was instrumental in getting NCATE established and has contributed considerably to it over the years.

The current ownership of accreditation by higher education is developing rapidly both within the teaching profession and outside it. The "Gatekeepers" report demonstrates citizen concerns, through their legislators, about the dependence on voluntary standards as a protection for the educational consumer.[7] The report reiterates the recommendation of the EPD Council, that there is a

> *...need to formulate a collaborative new system in which state officials can do a better job, acting with private accrediting bodies, federal officials, school administrators, and students--all of whom have a stake in the integrity of American schools.*[8]

Teachers welcome government attention to the *"professional development of the institutional gatekeepers,"*[9] and laud their efforts to assist in strengthening state approval and private, voluntary accrediting agencies.

The balance within NCATE has changed considerably in the last two years. A new NCATE constitution, adopted in January 1974, gives NEA and the American Association of Colleges for Teacher Education (AACTE) equal representation (eight members each), and also provides for the inclusion of new, additional constituencies from within the profession. The Student NEA and the Association of Teacher Educators (ATE) were admitted in October 1974. In May, the National Council of Teachers of Mathematics (NCTM) became a third associate. Indications show that these and other interested groups will go through the necessary processes to become full, contributing constituent members of NCATE, thereby broadening the professional control of NCATE.[10]

NCATE BUDGET INCLUDING ORGANIZATIONAL AND OTHER CONTRIBUTIONS

Year	Total Budget	NEA[a]	AACTE[b]	Visitation[c]	AASA[d]	Sustaining[e]	State Depts.[f]	NSBA[g]
1954-55	$ 35,836	$ 22,400	$ 13,336	$ -	$ -	$ -	$ -	$ 100
1955-56	32,600	22,400	10,000	-	-	250	-	-
1956-57	35,216	24,266	10,000	-	-	350	500	100
1957-58	39,423	24,000	14,023	-	-	500	900	-
1958-59	41,204	24,000	14,829	-	-	1225	1150	-
1960	62,840	24,000	18,277	-	17,113	1000	1550	900
1961	73,370	24,000	19,970	19,350	6,500	1900	1650	-
1962	91,663	24,000	21,713	28,000	14,500	1500	1750	200
1963	119,579	42,000	27,889	39,300	5,915	2625	1850	-
1964	110,132	42,000	36,382	26,500	1,000	2300	1950	-
1965	106,910	42,000	35,260	25,300	-	2300	2050	-
1966	79,541	31,500	32,491	11,000	-	2500	2050	-
1967	151,183	42,000	50,000	51,633	-	3350	2500	2000
1968	161,150	42,000	50,000	64,600	-	2550	1000	1000
1969	165,350	42,000	50,000	67,800	-	1850	2700	1000
1970	188,550	42,000	50,000	88,200	-	2850	4500	1000
1971	223,380	42,630	50,000	117,100	-	6150	6500	1000
1972	216,260	22,260	50,000	128,800	-	7400	6800	1000
1973	203,458	15,708	50,000	117,250	-	8600	10,900	1000
1974	274,846	57,000	71,146	128,400	-	7400	9,900	1000
TOTALS	$2,137,995	$652,164	$675,319	$913,233	$45,026	$156,600	$60,200	$10,300

a National Education Association
b American Association of Colleges for Teacher Education
c Fee paid by institutions for accreditation visits
d American Association of School Administrators
e Paid by accredited institutions not belonging to AACTE
f State Departments of Education
g National School Boards Association

The past few years have shown specific increases in the inclusion of K-12 practitioners at all levels. From 1971 to 1974 the percentage of K-12 practioners on NCATE visiting teams has risen from 12.1 to 39.1 percent. The six national NCATE Evaluation Boards now have three K-12 members. The 5-person NCATE Appeals Board (all formerly college males) now has two NEA past presidents (both women). The NCATE Coordinating Board also has a more balanced representation.

Teachers understand that no organization, agency, or institution can or should control accreditation in teacher education. They believe that control is the responsibility of the teaching profession, of which they are a significant part. The future looks bright, if the kind of shared responsibility that has taken place during the last two years continues.

NOTES

1. NEA Handbook, 1974-75. For Local, State and National Associations, (Washington, D.C.: National Education Association, 1974) p. 247.

2. Included in this article are a number of conclusions reached by the eight NEA members currently serving on NCATE, who met in an NEA-sponsored session in Washington, D.C., April 11-13, 1975. "Input for Paper on Current and Emerging Issues in Accreditation" (submitted to NCATE May 18, 1975).

3. These institutions prepare 84 percent of all teachers.

4. Available from NEA, 1201 16th St., N.W., Washington, D.C. 20036

5. Gatekeepers in Education: A Report on Institutional Licensing, (Washington, D.C.: National Advisory Council on Education Professions Development, April 1975) p. 11.

6. Robert N. Bush and Peter Enemark, "Control and Responsibility in Teacher Education," in Teacher Education. The Seventy-Fourth Yearbook of the National Society for the Study of Education, edited by Kevin Ryan (Chicago: University of Chicago Press, 1975) p. 267.

7. Gatekeepers in Education, pp. 1-3.

8. Ibid., p. 2.

9. Ibid., p. 24.

10. See new NCATE constitution, available from NCATE headquarters, 1750 Pennsylvania Ave., N.W., Washington, D.C. 20006

GOVERNANCE OF ACCREDITATION IN TEACHER EDUCATION

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This paper will attempt to identify issues relating to the governance of accreditation in teacher education. The perspective is that of a director of teacher education and certification within a state department of education, who has experience in cooperative relationships with the organized teaching profession, higher education organizations, the regional accrediting body, and several agencies of the U.S. Office of Education (USOE), as well as with the other state directors of teacher education and certification. Presumably, there is the underlying assumption that if the issues can be stated by the contending parties, avenues might be opened for their resolution.

Although the word "governance" has the strong connotation of "control," it also means responsibility for creative leadership for improvement. It also implies, at least according to American traditions, the involvement of affected parties in a parity relationship for decision making. Several points regarding governance in teacher education will be discussed below, and relevant major issues will be raised at each point.

STATE LEGAL AGENCIES

Under today's circumstances, the state legal agency for teacher education is the primary point of governance for teacher education. In whatever form--a state board of education, a separate professional standards board, or some combination of the two--there will be a state legal agency responsible for teacher education. Immediately, some major questions become apparent:

* What should be the composition, powers, and duties of the legal agency for policy making in teacher education? This is the agency that must determine the standards for preparing each category of professional school personnel, whether for secondary-school mathematics teachers, middle-school guidance counselors, elementary-school reading specialists, or kindergarten teachers and the like. This is the agency that must determine procedures by which the institutional program of preparation for any given category of professional school personnel is to be recognized for state teacher certification. This is the agency that must determine the standards and procedures for accrediting teacher education institutions. There is more concern now about the composition of this legal body. How many members should there be? How many representing colleges and universities? How many representing teacher practitioners from both public and private elementary and secondary schools? How many, if any, representing groups such as school boards, parent-teacher groups, students, and other citizens? There is also the matter of membership selection. Is this to be the sole prerogative of the appointing authority, or is selection limited to a roster of nominees provided by designated groups?

* Should the administration of teacher education be located within or without the usual bureaucracy of a state department of education? Obviously, someone must coordinate the program approval and accreditation processes. Someone must do the clerical work of preparing the certification documents. Someone must

coordinate the various study committees needed for developing and revising standards and processes. Most of all, full-time professional personnel must provide leadership and support for the official policy-making body. In a few states, the decision-making body is empowered to employ its own staff for these purposes and, consequently, there must be provision for financial support independent of the state department of education. In most states, whatever the policy-making body or process, the administrative and clerical staff is housed in the state department of education.

* What level of services and leadership will be exercised by the state legal agency for teacher education? Another way of asking this question is to indicate the degree of financial support that will be provided. If the state legal agency has the cooperation of all the other parties interested in teacher education, the financial burden can be shared or minimized by cooperative efforts and voluntary services. If the state legal agency must work independently, the cost will be considerably greater. The cost will also be greater if the state legal agency exercises the leadership responsibility mentioned earlier.

* What is the extent of involvement to be attempted in arriving at the final policy decisions? Both time and money are required for individuals to participate on councils, committees, or in conferences related to the decision-making process. Even the cost of distributing proposed policies by mail for reaction is a significant cost. Liaison with professional groups requires much staff time. The leadership of professional groups usually changes on an annual basis so that continuity of policy is difficult.

TEACHER EDUCATION INSTITUTIONS

Governance in the accreditation of teacher education is exercised significantly at the institutional level. Under the approved-program approach, as observed in most states, the state standards for teacher preparation are couched in general terms, and the individual teacher education institution is expected to develop its programs in accordance with these minimum guidelines. In exercising this latitude in program development, many decisions must be made within the decision-making structures of the institution. This gives rise to several of the current issues relating to governance in the accreditation of teacher education at the institutional level.

* Shall the institution seek accreditation from the National Council for Accreditation of Teacher Education (NCATE), or shall the institution seek only state-level accreditation for teacher education? The intensity of this issue certainly varies from state to state, and depends on experiences encountered by the institution in dealing with both state agency and NCATE personnel and procedures. Inherent in this issue is also the question of the extent to which the institution will attempt to influence the decision-making processes of the state agency and NCATE. If the institution elects to seek NCATE accreditation, the programs of teacher preparation must meet NCATE standards as well as the state guidelines.

* To what extent will the institution solicit and utilize input from teacher practitioners in elementary and secondary schools in the decision-making processes for teacher education? Teacher organizations are clamoring for an opportunity to help institutions devise programs that are more relevant to their

needs. Often they are highly critical of loose admission and selection practices at the institutional level. Perhaps the greatest source of friction stems from numerous complaints of supervising teachers about the operation of student teaching programs.

* To what extent should institutional resources be committed toward innovative changes in the teacher education programs? For example, a current question is whether an institution should initiate a changeover toward competency-based teacher education (CBTE). Is CBTE really a better way to prepare teachers, or is it another fad that will prove to be no better than traditional programming?

* To what extent shall institutional programs be field centered? Is the practice of offering meaningful laboratory experiences in teacher education more efficient and more effective than traditional programming? What is the appropriate balance between actual experiences in a real school situation and traditional college study?

* To what extent shall there be a permanent teacher education faculty at the institutional level, as opposed to a system of rotating employment of teacher practitioners from the field? Teacher practitioners charge that once a professor is away from the public school classroom for more than five years s/he is hopelessly out of date. They insist that the "cutting edge" of education is now in the classroom interface with pupils, rather than in the hallowed halls of ivy.

* Are supervising teachers to be considered as adjunct faculty of teacher education institutions? To what extent may they participate in policy-making decisions relating to student teaching, and relating to professional preparation prerequisite to student teaching? Generally speaking, the teaching profession has acknowledged responsibility for helping prepare new generations of teachers. The issue is whether supervising teachers are to be full partners in the teacher preparation process.

LOCAL SCHOOL DISTRICTS

The practices at the local school district level exert strong influence on the overall governance of accreditation of teacher preparation.

* Shall a school district give preference in employment to graduates of NCATE-accredited institutions? Presumably the legal structure does not permit the school district to employ graduates of institutions that are not state accredited, since these graduates would not be eligible for legal certification. The practice of a local school district to limit recruitment to graduates of NCATE-accredited institutions is a matter of recognition that has significant impact on the strength of NCATE.

* What means will be utilized by the local school district to encourage and promote professional staff development? Will an emphasis for continuing staff development be placed on additional graduate work? Will salary increments be tied to more advanced academic preparation? Will considerations for tenure or continuing contract status be linked to advanced academic preparation? Shall advanced academic preparation be campus oriented or field centered? Practices

at the local school-district level with respect to staff development will influence decision-making for accreditation standards. A current example is the growing objection to the NCATE standard that requires a period of full-time residence study for any advanced degree.

PROFESSIONAL ORGANIZATIONS

Professional organizations exercise a role in the governance of accreditation in teacher education. The American Association of Colleges for Teacher Education (AACTE) and the National Education Association (NEA) have been instrumental in supporting and furnishing membership to the NCATE Council and Coordinating Board. Activities of other organizations are also important:

* In recent years the American Association of School Administrators (AASA) set membership standards for their organization, including the requirement that applicants must have been prepared in graduate programs at NCATE-accredited institutions. A continuing issue within AASA might well be whether to continue this requirement.

* Teacher organizations are beginning to include provisions relating to teacher preparation in contracts with local school boards. One ploy is the declaration that the districts will only accept student teachers from NCATE-accredited institutions.

* In an era of oversupply of teachers, will the teacher organizations work toward collective bargaining agreements that specify preference in employment be given to graduates of NCATE-accredited programs?

NCATE

Issues relating to financing and staffing of NCATE are based on power considerations. It seems clear that NEA has the financial resources to support NCATE to a greater extent than AACTE does.

* Should institutional membership fees for NCATE be paid directly to NCATE, or should they continue to be routed through membership in AACTE?

* The new NCATE constitution provides that standards development and revision is the prerogative of the NCATE Council. Who will finance standards revision and development, and will the source of this financing exert control on the way standards are written?

* Additional personnel are needed to staff the NCATE operations. Is it possible for new personnel to be professionally neutral with respect to the issues that confront AACTE and NEA?

OTHER ISSUES

Three other issues are also worthy of consideration.

* Will state legal agencies exert stronger leadership in teacher education? Will they take the initiative to engage in mutually supportive activities with NCATE and the regional accrediting agencies?

* Will USOE become established as a superagency that "accredits" all other accrediting agencies by virtue of its power to require such recognition as a condition for any institution to receive federal funding?

* It remains to be seen what influence or impact will be exerted by the new Council on Postsecondary Accreditation. If agencies, organizations, and institutions become dissatisfied with existing processes and procedures for accreditation in teacher education, they may rally to the new Council.

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